CENTER FOR RESPONSIBLE FOOD BUSINESS

taylor@responsiblefoodbusiness.org

August 3, 2026

The Honorable Jackie Barber
Secretary of the Senate
Attn: Office of Public Records
144 Hart Senate Office Building
Washington, DC 20510-7116

The Honorable Kevin McCumber
Clerk of the U.S. House of Representatives
Attn: Legislative Resource Center
B-81 Cannon House Office Building
Washington, DC 20515

RE: Request for review of apparent noncompliance with the Lobbying Disclosure Act: Greenberg Traurig, LLP, Second Quarter 2026 Report (Form LD-2) for client Smithfield Foods, Inc. (Senate ID #16896-73447; House ID #315950643; Filing UUID bcf3673c-9069-4a7b-91a9-511d0c6bedcb)

Dear Secretary Barber and Clerk McCumber:

The Center for Responsible Food Business respectfully requests that your offices review an apparent violation of the Lobbying Disclosure Act of 1995, as amended ("LDA"), in the second-quarter 2026 report filed on July 20, 2026 by Greenberg Traurig, LLP for its client Smithfield Foods, Inc. On Line 19, the item calling for the interest of any foreign entity in the specific issues lobbied, the report answers "None." Forty days earlier, the same registrant's registration for the same client disclosed that a foreign entity, WH Group of Hong Kong, owns 86.9 percent of that client. The specific issues lobbied include, by name, foreign ownership of United States agricultural land. The two filings appear irreconcilable. Nor is the response an isolated lapse: as detailed in Part IV below, it is the fifteenth consecutive report since the beginning of 2023 in which a registrant for this client has reported lobbying on foreign-ownership legislation while marking Line 19 "None."

I. The filings at issue

On June 10, 2026, Greenberg Traurig filed a registration (Form LD-1), effective May 1, 2026, to lobby for Smithfield Foods, Inc. (Exhibit A). In response to Line 14 (Foreign Entities), the registration answers "Yes" and identifies WH Group, with its principal place of business in Kowloon, Hong Kong, as holding 86.9 percent ownership in the client. Line 12 of the same registration lists among the anticipated specific lobbying issues "issues related to foreign ownership of agricultural land."

On July 20, 2026, Greenberg Traurig filed its second-quarter 2026 report (Form LD-2) for Smithfield, reporting $120,000 in lobbying income (Exhibit B). The report contains two lobbying activity pages:

- The AGR page lists on Line 16: “Promoting science-based animal welfare standards; Farm Bill reauthorization; issues related to foreign ownership of agricultural land.” Line 17 identifies the U.S. Senate and U.S. House of Representatives.
- The FIN page lists on Line 16: “Issues related to foreign ownership of agricultural land. H.R. 7688 DPA Modernization Act.” Line 17 identifies the U.S. Senate, the U.S. House of Representatives, and the Department of the Treasury.

On both pages, in response to Line 19, “Interest of each foreign entity in the specific issues listed on line 16 above,” the registrant checked “None.” Both the registration and the report were digitally signed by the same registrant contact, forty days apart.

II. The disclosure requirement

The LDA requires each quarterly report to contain, for each general issue area, “a description of the interest, if any, of any foreign entity identified under section 1603(b)(4) of this title in the specific issues listed under subparagraph (A)”. 2 U.S.C. § 1604(b)(2)(D). The official instructions for Line 19 of Form LD-2 direct registrants to “[d]escribe the interest of each foreign entity in the specific issues listed on line 16” and to check the “none” box only “[i]f there are no foreign entity interests in this issue”. The “None” box is therefore available only where no previously identified foreign entity has an interest in the specific issues reported.

III. The apparent violation

WH Group is a foreign entity identified under section 1603(b)(4) on this registrant’s own registration for this client. An 86.9 percent owner has a direct and obvious interest in legislation and executive-branch action restricting foreign ownership of U.S. agricultural land: such measures bear on the very ownership structure the registration discloses. The FIN page underscores the point: it identifies the Department of the Treasury, which chairs the Committee on Foreign Investment in the United States, among the bodies contacted in connection with the issues on that page. We are aware of no reading of Line 19 under which a disclosed 86.9 percent foreign owner lacks an “interest” in restrictions on foreign ownership of the assets its subsidiary holds.

Nor is that interest hypothetical. Smithfield’s own Annual Report on Form 10-K for the fiscal year ended December 28, 2025 lists among its risk factors: “We may be impacted by legislation targeting foreign ownership of land, or foreign ownership or operation of facilities, located in the U.S.” (Exhibit J.) Measures that the client itself identifies as a business risk arising from its foreign ownership are measures in which its disclosed 86.9 percent foreign owner has an interest.

The “None” response also stands apart from the practice of registrants in analogous situations, which respond substantively to Line 19 even where the foreign parent’s interest is far more attenuated. Rolls-Royce North America’s second-quarter 2026 report states on Line 19 of each activity page: “Rolls-Royce PLC is the parent company of Rolls-Royce North America and benefits from the financial success thereof.” (Exhibit C.) Ballard Partners’ second-quarter 2026 report for Rolls-Royce North America states: “Rolls-Royce Holdings plc, as a parent company of Rolls-Royce North America, identified on the LD-1 report, has indirect interest in the issues identified in this report.” (Exhibit D.) Filings for Airbus Americas, Inc. by its in-house organization and by Invariant LLC likewise respond to Line 19 with a substantive statement addressed to the client’s foreign parent rather than marking “None”

(Exhibits E and F). Registrants thus answer Line 19 even where the parent's interest in general defense, aviation, and economic issues is indirect; here, by contrast, the specific issue lobbied is foreign ownership itself, and the response given was "None."

IV. The same omission recurs in fifteen consecutive reports across two registrants

Greenberg Traurig's "None" response is not an isolated lapse. Smithfield's prior registrant, Holland & Knight LLP, registered for this client effective June 3, 2019, and its registration likewise answers "Yes" on Line 14 and identifies WH Group, Kowloon, Hong Kong, then holding 100 percent ownership of the client (Exhibit H). WH Group has accordingly been a foreign entity identified under section 1603(b)(4) for this client, by each successive registrant, since 2019.

Foreign-ownership legislation first appears in Holland & Knight's reports for this client in the first quarter of 2023: the FIN page of that report lists "S. 168/H.R. 683 - PASS Act of 2023", legislation restricting acquisitions of United States agricultural land and agricultural businesses by certain foreign persons, and marks Line 19 "None" (Exhibit I). The second-quarter 2023 FIN page adds "foreign ownership restrictions"; from the third quarter of 2023 the reports add "Senate Amendment 813 (Rounds) - foreign farmland ownership restrictions" and, in later quarters, "issues related to foreign ownership of agricultural land." In every quarterly report from the first quarter of 2023 forward, including its first-quarter 2026 report (Exhibit G) and the termination report it filed on May 21, 2026, Holland & Knight reported lobbying on these foreign-ownership issues and marked Line 19 "None." Together with the Greenberg Traurig report that is the subject of this letter, fifteen consecutive reports covering fourteen consecutive calendar quarters report lobbying on foreign-ownership legislation for this client while answering "None" to Line 19. Appendix A identifies each filing. We respectfully request that your offices review each of these reports under the same provisions.

V. Requested actions

We respectfully request that your offices:

1. Review the fifteen reports identified in Appendix A for accuracy and completeness pursuant to 2 U.S.C. § 1605(a)(2);
2. Notify each registrant in writing of its apparent noncompliance pursuant to 2 U.S.C. § 1605(a)(7);
3. Request that each registrant file corrected reports accurately describing WH Group's interest in the specific issues reported;
4. If a registrant fails to provide an appropriate response within 60 days of that notice, notify the United States Attorney for the District of Columbia pursuant to 2 U.S.C. § 1605(a)(8); and
5. Confirm receipt of this letter.

Each filing cited above is publicly available on the Senate Lobbying Disclosure database and is identified by UUID in the exhibit list below. We retain true copies of each filing as posted as of the date of this letter.

Thank you for your attention to this matter. Please direct any questions or correspondence regarding this request to the undersigned.

Sincerely,

Taylor Warren
President
Center for Responsible Food Business
taylor@responsiblefoodbusiness.org

cc: Civil Division, U.S. Attorney's Office for the District of Columbia, 601 D Street NW, Washington, DC 20530

Exhibits (public filings, U.S. Senate Lobbying Disclosure database, lda.senate.gov)

Exhibit A. Greenberg Traurig, LLP: Registration (LD-1) for Smithfield Foods, Inc., signed June 10, 2026.
https://lda.senate.gov/filings/public/filing/3e8debb2-7575-430f-867c-984d051dda00/print/

Exhibit B. Greenberg Traurig, LLP: Q2 2026 Report (LD-2) for Smithfield Foods, Inc., signed July 20, 2026.
https://lda.senate.gov/filings/public/filing/bcf3673c-9069-4a7b-91a9-511d0c6bedcb/print/

Exhibit C. Rolls-Royce North America and its Affiliates: Q2 2026 Report (LD-2).
https://lda.senate.gov/filings/public/filing/9a05d10a-7b99-449b-a9f0-17f81a9c13bc/print/

Exhibit D. Ballard Partners: Q2 2026 Report (LD-2) for Rolls-Royce North America.
https://lda.senate.gov/filings/public/filing/026aced8-d3f7-4fe9-83ad-996b35230326/print/

Exhibit E. Airbus Americas, Inc.: Q2 2026 Report (LD-2).
https://lda.senate.gov/filings/public/filing/32363c27-b92e-4f1f-b825-a7acccfe3d53/print/

Exhibit F. Invariant LLC: Q2 2026 Report (LD-2) for Airbus Americas, Inc.
https://lda.senate.gov/filings/public/filing/b299159f-5187-4aa2-80a7-6377d46cafe0/print/

Exhibit G. Holland & Knight LLP: Q1 2026 Report (LD-2) for Smithfield Foods, Inc.
https://lda.senate.gov/filings/public/filing/290e4e7d-1a54-4b7d-ac05-b73bc5994fb6/print/

Exhibit H. Holland & Knight LLP: Registration (LD-1) for Smithfield Foods, Inc., effective June 3, 2019.
https://lda.senate.gov/filings/public/filing/b9433b61-1929-4252-991f-37a81a742f42/print/

Exhibit I. Holland & Knight LLP: Q1 2023 Report (LD-2) for Smithfield Foods, Inc.
https://lda.senate.gov/filings/public/filing/65a5b232-5f83-4cbc-a883-b345c4ff851e/print/

Exhibit J. Smithfield Foods, Inc.: Annual Report on Form 10-K for the fiscal year ended December 28, 2025 (Risk Factors). https://www.sec.gov/Archives/edgar/data/91388/000009138826000014/smf-20251228.htm

Appendix A: Reports for Smithfield Foods, Inc. reporting lobbying on foreign-ownership legislation with Line 19 marked "None" (Q1 2023 through Q2 2026)

No.	Reporting period	Registrant	Filing UUID (lda.senate.gov)
1	Q1 2023	Holland & Knight LLP	65a5b232-5f83-4cbc-a883-b345c4ff851e
2	Q2 2023	Holland & Knight LLP	fc02183e-7dd8-4819-b3e4-313711028606
3	Q3 2023	Holland & Knight LLP	c8442cd3-7464-4571-8aaa-d3b765b5fc84
4	Q4 2023	Holland & Knight LLP	33c810f1-ee3b-494c-8191-0d70f4a2c869
5	Q1 2024	Holland & Knight LLP	ab82ffee-4d79-4675-91c2-37ea394a0fe7
6	Q2 2024	Holland & Knight LLP	482d8220-13c8-409a-bf80-862303734bb5

7	Q3 2024	Holland & Knight LLP	17719b8d-558b-47ec-9e31-9597a3d9d2c0
8	Q4 2024	Holland & Knight LLP	6e785569-2514-4a15-84e8-6300b212e577
9	Q1 2025	Holland & Knight LLP	27f09208-c0a6-4dd7-9256-0e71c95c2e2a
10	Q2 2025	Holland & Knight LLP	ef703ba5-ee98-40b4-84e7-14a298ff8f4c
11	Q3 2025	Holland & Knight LLP	b79901e5-9e74-4dd1-b44c-8361ce3c9a22
12	Q4 2025	Holland & Knight LLP	c86181d9-80fb-4d68-8834-5f155cfa0ee1
13	Q1 2026	Holland & Knight LLP	290e4e7d-1a54-4b7d-ac05-b73bc5994fb6
14	Q2 2026 (termination report)	Holland & Knight LLP	cc99d59a-9117-4ba3-8c19-258cba324df6
15	Q2 2026	Greenberg Traurig, LLP	bcf3673c-9069-4a7b-91a9-511d0c6bedcb

Each filing is available at https://lda.senate.gov/filings/public/filing/[UUID]/print/. In each listed report, at least one lobbying activity page lists among the specific issues on Line 16 the PASS Act of 2023 (S. 168/H.R. 683), “foreign ownership restrictions”, “foreign farmland ownership restrictions”, or “issues related to foreign ownership of agricultural land”, and Line 19 for that page is marked “None.”